

# EXHIBIT 15



1105 NORTH MARKET STREET  
SUITE 901  
WILMINGTON, DELAWARE 19801

MAILING ADDRESS:  
P.O. Box 1380  
WILMINGTON, DE 19899-1380

JOSEPH GREY  
[JGREY@CROSSLAW.COM](mailto:JGREY@CROSSLAW.COM)  
(302) 777-4200, EXT. 110

October 18, 2021

**VIA EMAIL**

Robert D. Cecil, Jr., Esquire, [rcecil@trplaw.com](mailto:rcecil@trplaw.com)  
Mark D. Plevin, Esquire, [mplevin@crowell.com](mailto:mplevin@crowell.com)  
Tacie H. Yoon, Esquire, [tyoon@crowell.com](mailto:tyoon@crowell.com)  
Kelly T. Currie, Esquire, [kcurrie@crowell.com](mailto:kcurrie@crowell.com)  
Kathleen N. Miller, Esquire, [kmiller@skjlaw.com](mailto:kmiller@skjlaw.com)  
Lloyd A. Gura, Esquire, [lgura@moundcotton.com](mailto:lgura@moundcotton.com)  
Stamatios Stamoulis, Esquire, [stamoulis@swdelaw.com](mailto:stamoulis@swdelaw.com)  
Tancredi Schiavoni, Esquire, [tschiavoni@omm.com](mailto:tschiavoni@omm.com)  
Matthew G. Summers, Esquire, [summersm@ballardspahr.com](mailto:summersm@ballardspahr.com)  
Harry Lee, Esquire, [hlee@steptoe.com](mailto:hlee@steptoe.com)  
Harris B. Winsberg, Esquire, [harris.winsberg@troutman.com](mailto:harris.winsberg@troutman.com)  
Margaret H. Warner, Esquire, [mwarner@mwe.com](mailto:mwarner@mwe.com)  
Bruce W. McCullough, Esquire, [bmmccullough@bodellbove.com](mailto:bmmccullough@bodellbove.com)  
Bruce D. Celebrezze, Esquire, [bruce.celebrezze@clydeco.us](mailto:bruce.celebrezze@clydeco.us)  
Konrad R. Krebs, Esquire, [Konrad.krebs@clydeco.us](mailto:Konrad.krebs@clydeco.us)  
David Christian, Esquire, [dchristian@dca.law](mailto:dchristian@dca.law)  
Dierdre M. Richards, Esquire, [drichards@finemanlawfirm.com](mailto:drichards@finemanlawfirm.com)  
Susan N. K. Gummow, Esquire, [sgummow@fgppr.com](mailto:sgummow@fgppr.com)  
Michael Rosenthal, Esquire, [mrosenthal@gibsondunn.com](mailto:mrosenthal@gibsondunn.com)  
Matthew G. Bouslog, Esquire, [mbouslog@gibsondunn.com](mailto:mbouslog@gibsondunn.com)  
Carl Kunz, Esquire, [ckunz@morrisjames.com](mailto:ckunz@morrisjames.com)  
Margaret M. Anderson, Esquire, [panderson@foxswibel.com](mailto:panderson@foxswibel.com)  
Michael J. Joyce, Esquire, [mjoyce@mjlawoffices.com](mailto:mjoyce@mjlawoffices.com)  
Lorraine Armenti, Esquire, [lamenti@cmg.law](mailto:lamenti@cmg.law)  
Britton C. Lewis, Esquire, [bcl@crlaw.com](mailto:bcl@crlaw.com)  
David M. Fournier, Esquire, [fournierd@pepperlaw.com](mailto:fournierd@pepperlaw.com)  
Todd C. Jacobs, Esquire, [tjacobs@bradleyriley.com](mailto:tjacobs@bradleyriley.com)

**RE: In re Boy Scouts of America and Delaware BSA, LLC, No. 20-10343 (LSS)**

Dear Counsel:

This firm represents non-party AVA Law Group, Inc. in connection with the above-referenced matter (the “BSA Chapter 11 Cases”) pending in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). We are in receipt of *Certain Insurers’ First Set of Requests for the Production of Documents to AVA Law Group, Kosnoff Law, and Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. Individually and as Doing Business as Abused in Scouting* (the “Requests for Production”) and *Certain Insurers’ First Set of Interrogatories to AVA Law Group, Kosnoff Law, and Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. Individually and as Doing Business as Abused in Scouting* (the “Interrogatories”), each dated October 8, 2021. We offer this response solely on behalf of the AVA Law Group, Inc.

The Requests for Production and Interrogatories are directed to AVA Law Group, Inc. “[p]ursuant to Federal Rules of Bankruptcy Procedure 7033, 7034 and 9014”. However, AVA Law Group, Inc. is not a party to the BSA Chapter 11 Cases, let alone a “Participating Party” in accordance with the Bankruptcy Court’s *Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors’ Plan of Reorganization, (II) Establishing Certain Protocols, and (III) Granting Related Relief* [D.I. 6528]. The AVA Law Group, Inc. has filed certain proofs of claim on behalf of claimants it represents, but AVA Law Group, Inc., in its own capacity, is not a party in interest in the BSA Chapter 11 Cases, and AVA Law Group, Inc. has not made any demands or requests in the BSA Chapter 11 Cases in its own right. As you well know, interrogatories may only be served on a party. Fed. R. Civ. P. 33(a)(1) (“ . . . a party may serve on any other **party** no more than 25 written interrogatories . . .”) (emphasis added); *see* Fed. R. Bankr. P. 7033 (“Interrogatories to Parties”). The same concept applies to requests for production of documents. Fed. R. Civ. P. 34(a)(1).

While documents, of course, may be discovered from non-parties, they must be discovered by a subpoena properly issued and served in accordance with Rule 45 of the Federal Rules of Civil Procedure. The Requests for Production are party notice-style document requests issued under Rule 34 and expressly “[p]ursuant to Federal Rules of Bankruptcy Procedure 7033, 7034 and 9014,” not a properly issued and served subpoena.

Therefore, as AVA Law Group, Inc. is not a party, we request that you immediately confirm that you have withdrawn the Interrogatories and Requests for Production.

We are aware that subpoenas issued from the United States Bankruptcy Court for the Southern District of California have been directed to AVA Law Group, Inc. and its principal, Mr. Andrew Van Arsdale, Esquire. This firm is not authorized to accept service of these subpoenas and our client reserves and expressly does not waive any and all rights with respect to these subpoenas, including all rights to object to the subpoenas pursuant to Rule 45(d)(2)(B) or to move to quash the subpoenas pursuant to Rule 45(d)(3). Pursuant to Rule 45, any disputes concerning the subpoenas must be heard in the United States District Court for the Southern District of California because that is where the subpoenas purport to require compliance. We understand that

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California counsel for the persons to whom the subpoenas were directed will respond to them separately.

Sincerely,

*/s/ Joseph Grey*

Joseph Grey

cc: Andrew Van Arsdale, Esquire  
File Copy